

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No. 8:03-CR-77-T-30TBM

GHASSAN ZAYED BALLUT

**DEFENDANT GHASSAN BALLUT'S EX PARTE MOTION
FOR TRAVEL AUTHORIZATION FOR PARALEGAL**

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, pursuant to 18 U.S.C. § 3006A, hereby requests the Court to issue a Travel Authorization to pay the costs for the court-appointed paralegal, Brooke Elvington, to travel from Tampa, Florida, to Chicago, Illinois, and return and for her lodging and per diem for up to three days in Chicago, and as grounds therefor would state:

1. The Defendant is a resident of the Chicago area and is unable to fly on commercial airlines because he is currently on the Transportation Security Administration's "no-fly list."
2. For this reason, the Defendant is unable to travel efficiently to the Tampa area to meet with his counsel or the paralegal without substantial inconvenience and cost to himself and his business in Chicago.
3. As a result of the paralegal's extensive review, organization, and summarization of the hundreds of transcripts, multiple translations, and "tech cuts" of the FISA telephone intercepts that were discovered by the Government in this case, the paralegal is the person most familiar with the details of the intercepted telephone calls on which the Defendant appears as a speaker and, as a trial attorney trained in the rules of evidence, the paralegal is in the best position to brief the Defendant concerning these calls and discuss the use and interpretation of these

conversations as evidence at trial.

4. It is necessary for the Defendant and the paralegal to meet in person to discuss these intercepted conversations in order to prepare the Defendant's defense for the upcoming trial, as such extensive preparation cannot be conducted adequately or appropriately by telephone or other long distance communication.

5. The Defendant and his undersigned counsel reasonably believe that at least two full working days will be required for the paralegal to meet with the Defendant for this preparation and that under the circumstances this meeting must be held in Chicago.

6. The paralegal intends to arrange her travel and lodging to be in Chicago for at least two full working days in late February or early March, 2005, and therefore will require not more than three nights' lodging.

7. As a paralegal appointed under the Criminal Justice Act, the paralegal is required to obtain a Travel Authorization from the Court which will permit both the National Travel Service and the Court's CJA coordinator to facilitate payment for air travel, lodging, meals, and per diem expenses.

8. Based on similar prior travel by the Defendant's undersigned counsel to Chicago in this cause, the total costs for lodging, travel, and meal expenses for up to three days would not exceed \$1,000.00.

WHEREFORE, the Defendant requests the Court to issue a Travel Authorization to pay the costs for the paralegal, Brooke Elvington, to travel from Tampa, Florida, to Chicago, Illinois, and return and for her lodging and per diem for up to three days in Chicago.

Respectfully submitted,

Date: February 11, 2005

S/ Bruce G. Howie
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